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Attorneys for Defendant
National Collegiate Athletic
Association, an
Unincorporated Association.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

SHANNON RAY, KATHERINE SEBBANE,
KHALA TAYLOR, PETER ROBINSON, AND
RUDY BARAJAS, individually and on
behalf of all those similarly
situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE ATHLETIC
ASSOCIATION, an unincorporated
association,

Defendant.

CLASS ACTION

**JOINT STIPULATION AND
ORDER FOR CONTINUANCE OF
SUMMARY JUDGMENT HEARING AND
MODIFYING SCHEDULE**

No. 1:23-cv-00425 WBS CSK

Judge: The Honorable William B.
Shubb
Assigned to Hon. Judge Chi Soo
Kim for Non-Dispositive Issues

1 Whereas, there have only been modest modifications to the
2 case schedule to date;

3 Whereas, the parties have engaged in settlement
4 conversations to try to resolve this action and are now retaining
5 a mediator to assist in continuing those conversations in
6 October;

7 Whereas, the parties wish to continue the September 29, 2025
8 hearing date for the pending motion for summary judgment to the
9 next available date, which is November 10, 2025, to allow more
10 time to explore resolution of the action;

11 Whereas, the parties have met and conferred and agreed to
12 extend the remaining case deadlines approximately 30 days to
13 allow the parties time to focus on settlement discussions prior
14 to the close of fact discovery and upcoming expert reports;

15 Whereas, this proposal does not seek to modify the trial
16 date;

17 Whereas, the parties have agreed on the following proposed
18 modifications to the schedule:

- 19 • An extension of the deadline for expert reports from
20 October 24, 2025, to November 24, 2025, and for
21 rebuttal reports from December 5, 2025, to January 9,
22 2026;
- 23 • An extension of the close of fact discovery from
24 October 24, 2025, to November 24, 2025, and the close
25 of expert discovery from December 19, 2026 to January
26 26, 2026;

- An extension of the deadline for dispositive or *Daubert* motions from December 22, 2025, to February 2, 2026 with a briefing schedule as set forth below;

IT IS HEREBY STIPULATED by and between the parties, in accordance with Local Rule 144, that, if necessary:

1. The parties will appear for a summary judgment hearing on November 10, 2025.
2. The parties agree that the response date for all outstanding discovery requests is extended by 30 days.
3. The parties will serve expert reports by November 24, 2025, and will serve rebuttal reports by January 9, 2025;
4. The deadline for the close of fact discovery will be November 24, 2025, and the close of expert discovery on January 26, 2026; and
5. The parties will file any dispositive or *Daubert* motions no later than February 2, 2026. Oppositions to any such motions will be due March 9, 2026, and reply briefs due March 27, 2026. Should either party choose to submit a dispositive or *Daubert* motion prior to the deadline the briefing timeline in the local rules shall apply unless otherwise negotiated by the parties and approved by the Court.

1 Respectfully submitted, MUNGER, TOLLES & OLSON LLP
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FILER'S ATTESTATION

Pursuant to L.R. 5-4.3.4(2), I certify that all other signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

/s/ Carolyn Hoecker Luedtke
Carolyn Hoecker Luedtke

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CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record registered for electronic filing.

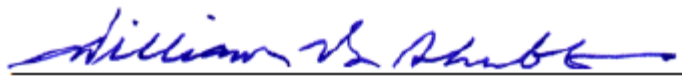
/s/ Carolyn Hoecker Luedtke
Carolyn Hoecker Luedtke

ORDER

The Court, having considered the parties' stipulation, and cause appearing, hereby orders that:

1. The parties having been informed that the next available hearing date is October 14, 2025, and agreeing to that date, the hearing for the Plaintiffs' motion for summary judgment will be continued from September 29, 2025 to October 14, 2025 at 1:30 p.m.;
2. The parties will serve expert reports by November 24, 2025, and will serve rebuttal reports by January 9, 2026;
3. The deadline for the close of fact discovery will be November 24, 2025;
4. The deadline for the close of expert discovery will be January 26, 2026;
5. The parties will file any dispositive or *Daubert* motions by February 2, 2026;
6. Oppositions to any dispositive or *Daubert* motions will be due March 9, 2026;
7. Replies in support of any dispositive or *Daubert* motions will be due March 27, 2026;
8. Should either party choose to submit a dispositive or *Daubert* motion prior to the deadline the briefing timeline in the local rules shall apply unless otherwise negotiated by the parties and approved by the Court.

Dated: September 26, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE